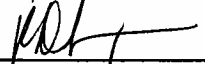


Certificate Under 37 CFR 1.8

I hereby certify that this correspondence is being electronically transmitted to the U.S. Patent and Trademark Office, Commissioner for Patents, via the EFS on March 13, 2009.


Robert D. Summers, Jr., Reg. No. 57,844

**BRINKS
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GILSON
& LIONE**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Appln. of: McGiffin et al.

Appln. No.: 10/783,841

Filed: February 20, 2004

For: ACCOUNT LEVEL PARTICIPATION
FOR UNDERWRITING
COMPONENTS

Examiner: Swartz, Jamie H.

Art Unit: 3694

Confirmation No. 7513

Attorney Docket No: 10022/444

AMENDMENT AND RESPONSE TO OFFICE ACTION

Mail Stop AMENDMENT
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

Assignee has timely filed the following amendments and response to the Non-Final Office Action mailed November 13, 2008 ("Office Action"). Assignee respectfully requests reconsideration and allowance of the present claims in view of the following remarks.

Amendments to the Claims begin on page 2 of this response.

Remarks and Arguments begin on page 9 of this response.